

FILED

12/19/2023

JXM

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Dec 19, 2023

UNITED STATES OF AMERICA

v.

WILLIAM FILLYAW

) **1:23-cr-00650**
) **Judge Matthew F. Kennelly**
) Case No. **Judge Gabriel A. Fuentes**
) **CAT 3 / RANDOM**
) Violations: Title 18, United
) States Code, Sections 922(g)(1)
) and 924(c)(1)(A); Title 21,
) United States Code, Section
) 841(a)(1)

COUNT ONE

THE SPECIAL NOVEMBER 2022 GRAND JURY charges:

On or about October 28, 2022, at Gurnee, in the Northern District of Illinois,
Eastern Division,

WILLIAM FILLYAW,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide), a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

THE SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about October 28, 2022, in the Northern District of Illinois, Eastern Division,

WILLIAM FILLYAW,

defendant herein, did knowingly possess a firearm, namely, a loaded PF940C Polymer80 9 mm pistol bearing no serial number, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

THE SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about October 28, 2022, in the Northern District of Illinois, Eastern Division,

WILLIAM FILLYAW,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, ammunition, namely, fourteen Armscor USA 9 mm Luger cartridges, which ammunition had traveled in interstate and foreign commerce prior to defendant's possession of the ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2022 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 922(g)(1), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearms and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. In addition, upon conviction of an offense in violation of Title 21, United States Code, Section 841, as set forth in this Indictment, defendant shall forfeit to the United States of America any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Section 853.

3. The property to be forfeited includes, but is not limited to, a PF940C Polymer80 9 mm pistol bearing no serial number and associated ammunition, including fourteen Armscor USA 9 mm Luger cartridges.

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY